

UNITED STATES DISTRICT COURT  
DISTRICT OF NORTHERN GEORGIA  
ATLANTA DIVISION

AUG 13 2014

By: *James N. Hatten, Clerk*  
*Cheryl G. Ginn, Deputy Clerk*

Adrian Martinez Montanez,

Movant,

v.

Case No.: 1:11-CV-1456-CAP-ECS  
1:11-CR-239-CAP-ECS

United States of America,

Respondent.

/

**MOTION FOR AN EXTENSION OF TIME TO REPLY  
TO THE GOVERNMENT'S RESPONSIVE BRIEF**

Mr. Montanez requests this court extend the time for filing a reply to the government's responsive brief until September 15, 2014, in order to allow him adequate time to develop his brief.

Full exposition of the issues will require a significant effort that cannot be timely completed under the combination of current prison conditions and Mr. Montanez's lack of either legal training or writing experience.

At Coleman Low, access to legal resources is limited to, at the most, 18 hours a week. These resources (shared among 1800 inmates) include 18 legal computer workstations, 6 general purpose ribbon-style typewriters, 1 mail-weighing scale, and a single copier. Mr. Montanez is an incarcerated indigent and he is proceeding pro se. He is inexperienced in the law and must depend on the pro bono assistance of other inmates to help him with

preparing and writing his brief. Frank L. Amodeo has agreed to help Mr. Montanez, but in order to effectively help Mr. Montanez, an extension of time is required.

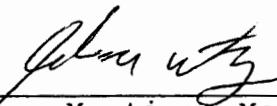
For the foregoing reasons, Mr. Montanez respectfully requests this court to extend the time for filing a reply until September 15, 2014.

Respectfully submitted this 4th day of August 2014 by:

  
Adrian Martinez Montanez  
Reg. #22993-171  
Federal Correctional Complex  
Coleman - Low, Unit C3  
P.O. Box 1031  
Coleman, Florida 33521-1031

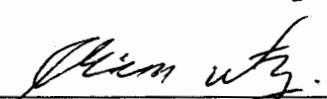
#### CERTIFICATE OF SERVICE

This motion was delivered in a pre-addressed, postage-paid envelope to the prison mailing authorities on the same day as signed. The United States of America is represented by counsel who is registered with the CM/ECF docketing system: thus the movant requests that notice of the filing and service of this motion on the United States occur through that system's electronic medium.

  
Adrian Martinez Montanez

#### VERIFICATION

Under penalty of perjury as authorized in 28 U.S.C. §1746, I declare the factual allegations and factual statements contained in this motion are true and correct to the best of my knowledge.

  
Adrian Martinez Montanez

Adrian Martinez Montanez #22993-171  
Federal Correctional Complex  
Coleman - Low, Unit C3  
P.O. Box 1031  
Coleman, Florida 33521-1031

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SAINT PETERSBURG, FL  
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